

DECLARATION OF DEPORTATION OFFICER DANIEL J. MORAN


Pursuant to the authority of 28 U.S.C. § 1746, I, Daniel J. Moran, a Deportation Officer for U.S. Department of Homeland Security, United States Immigration and Customs Enforcement, Enforcement and Removal Operations, Hartford, Connecticut declare as follows:

1. I am a Deportation Officer (“DO”) for U.S. Department of Homeland Security, United States Immigration and Customs Enforcement, Enforcement and Removal Operations (“ICE”). I have been an employee of ICE since April 20, 2008. I attended Basic Immigration Enforcement Training Program in 2008 and have been employed as a professional immigration officer in a full time, continuous status for approximately 12 years. I have received training and experience in the enforcement of the immigration laws of the United States and detection and apprehension of aliens who are in the United States unlawfully.
2. I am currently assigned to the Alternatives to Detention ("ATD") Unit in the ICE ERO Hartford, Connecticut Sub Office of Boston, Massachusetts Field Office. I have been a member of this unit for approximately sixteen (16) months. Among other duties, I am assigned to supervise those cases that are not in custody and are being monitored by technology in the ATD program. There are three DOs in the ATD unit.
3. Additionally, the ATD unit also handles enrollment of individuals into the ATD program who were ordered released by immigration judges or who ERO determines amenable to release into the ATD program.
4. I estimate in the sixteen months of working as a member of the ATD unit that I have enrolled twenty (20) individuals into the ATD program.
5. The purpose of this declaration is to set forth the standard practices I employ when enrolling an individual into the ATD program. I am aware that a number of individuals ordered released by this Court have made allegations that ICE officers provided inconsistent information as to this Court’s release order. As set forth below, I do not recall providing any such inconsistent information and it would be outside my standard practice to provide information in the manner the individuals have claimed in this case.
6. I have reviewed the allegations made by Kavon Mahadeo who was ordered released by this Court order. I am aware that Mr. Mahadeo has stated that “Veronica” from BI told

him on June 10, 2020 that I told her that he could leave his residence. I do not recall any specific conversations pertaining to "Home Confinement" with either Mr. Mahadeo or his case specialist at BI Incorporated, Beronica Perez. More specifically, a search of all my email, phone and text messages on June 10, 2020 revealed I did not call, text or send an email to Beronica. The only communications I had with Beronica on June 10, 2020 was her emailing me about violations of other participants on my docket, none of which I replied to. Additionally, none of the emails she sent to me on June 10, 2020 were pertaining to Mr. Mahadeo. Furthermore, I have never had direct contact with Mr. Mahadeo.

7. As a matter of general practice, when asked a specific question regarding to terms and conditions of release by any subject I either assist them in referring to the Order of Recognizance ("OREC") or Order of Supervision ("OSUP") paperwork provided by the Detained Unit or suggest they consult with their attorney. At no point do I provide alternative interpretations for any language found in their respective paperwork. If the subject requests clarification of any kind I only suggest they refer to their attorney for guidance. As such, I dispute as a general matter that myself or any other ATD DO would provide information to an individual being enrolled into the ATD program and released from ICE custody that is inconsistent with the information contained in the OREC or OSUP paperwork. To provide contrary information would be against my training, common practice, and job responsibilities.

On this 24th day of June 2020, I Daniel J. Moran, attest that the statements made above are true and accurate under the pains and penalties of perjury.

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Daniel J. Moran

Deportation Officer

U.S. Department of Homeland Security

United States Immigration and Customs Enforcement

Hartford, Connecticut